

**FILED**

**MAR 12 2012**

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

John Doe,  
Plaintiff,

vs.

David H. Petraeus,  
Director of Central Intelligence Agency,  
Defendant.

Serve: David H. Petraeus  
Director of Central Intelligence Agency  
Litigation Division  
Office of General Counsel  
Central Intelligence Agency  
Washington, DC 20505

Ronald C. Machen, Jr.  
Office of the United States Attorney  
Attention: Civil Process Clerk  
555 4<sup>th</sup> Street, NW  
Washington, DC 20530

Eric Holder  
United States Attorney General  
c/o Department of Justice  
950 Pennsylvania Avenue, NW  
Room B-103  
Washington, DC 20530-0001

Defendant.

§ CIVIL ACTION NO. \_\_\_\_\_

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Case: 1:12-cv-00382  
Assigned To : Roberts, Richard W.  
Assign. Date : 3/12/2012  
Description: Employ. Discrim.

§ A JURY IS DEMANDED

Plaintiff's Motion to Appear as John Doe

The plaintiff respectfully requests permission to appear in this case as John Doe, for the following reasons. The CIA offered a classified position to the plaintiff, but revoked the offer because of disability – Type 1 diabetes. If his

identity is revealed in a public document, his association with Agency will be public, and would interfere with reinstatement to the position which was offered to him. The Agency informed the undersigned that the plaintiff could proceed as John Doe, or by using only his first name. Hence, he is doing so, so as to prevent his association with the Agency from being public..

The plaintiff's counsel has consulted with the CIA and advised them of the plaintiff's intent to proceed in this case as John Doe and the reasons for proceeding in that fashion, and has pre-cleared the Complaint with the Agency, which has confirmed in writing that the Complaint does not contain any classified information.

#### Conclusion

Given these circumstances, the plaintiff requests permission to appear as John Doe. He also asks that the Court defer any requirement that he identify himself and his address until his counsel appears before the Court to discuss the public association of his name with the Agency. He notes, in that regard, that Ms. Butler and Mr. Griffin sought and received security clearances before they could represent him in this litigation and currently are representing him within the constraints of agreements signed with the Agency.

Respectfully submitted,

John Doe,

By his attorneys,

A handwritten signature in black ink, appearing to be "L. D. Rosh", written over a horizontal line.

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Counsel for the Plaintiff